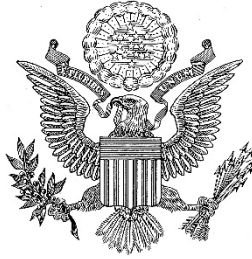


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August 1, 2024

Honorable Brenda K. Sannes  
Chief United States District Court Judge  
James Hanley Federal Building  
100 South Clinton Street  
Syracuse, New York 13261

**RE: UNITED STATES v. PATRICK DAI  
CASE NO.: 3:24-CR-0160 (BKS)**

Dear Chief Judge Sannes:

Attached please find a character letter we received today from Officer Katie Connors of the Broome County Jail.

Very truly yours,

OFFICE OF THE FEDERAL PUBLIC DEFENDER

By: *s/ Lisa A. Peebles*  
Lisa A. Peebles  
Federal Public Defender

cc: Stephen Green, AUSA (by ECF)  
Geoffrey Brown, AUSA (by ECF)  
Michael Gadarian, AUSA (by ECF)  
U.S. Probation (by ECF)

I have been employed as a Correction Officer, with the Broome County Sheriff's Department since 2006. I am writing this letter on behalf of Patrick Dai, in regards to illustrating the types of interactions I have had with him during his incarceration. I first encountered Patrick a few days after he was brought into our facility. He was quiet, isolated, scared, withdrawn, and very emotional. To say Patrick was out of his element would be an understatement. Medical staff was conducting their rounds and needed to get vitals on Patrick. He appeared depressed, quiet, and at this point I considered that there may be a language barrier between he and I. I didn't give it another thought.

My next encounter would be his first visit with his parents. The visit started with a very loving embrace with his mother that brought Patrick to tears. They then sat and started to speak very quickly and animated in Chinese. I remember wishing that I had a translator because the conversation seemed so passionate, when suddenly Patrick loudly proclaimed in English, "Mama NO, Summer is going to get fat! You need to squeeze all the oil out of the sardine first," (speaking of his cat). To which everyone erupted with laughter. This is where my rapport with Patrick and his family began. I had more conversations with Patrick, and it was easy for me to see that Patrick was in my opinion either autistic or at the very least he was on the spectrum with a developmental disability resulting in him being ultra compliant and impressionable. At another visit, while waiting for Patrick to arrive, I was speaking to his mother, and she was telling me childhood stories about kids who took advantage of his inability to stand up for himself or be mean to others. It was at this time I asked her if he was diagnosed with autism, to which she stated he was not. She said he had always been very smart and different, but that's all. In this particular visit Patrick arrived and had between twenty and thirty book titles memorized using acronyms. He spoke about a family of ants in his cell, and he didn't have the heart to kill them. He was demanding to his mother that she not leave him anymore money. He stated that the family needed it more than him and he would ration what he had. Patrick started to perk up as time went on. Per facility rules and regulations each inmate needs to be strip searched at the completion of every contact visit. During Patrick's searches he could be heard singing the "Elmo" theme song or "Thomas the train."

He was housed in our medical department to begin with due to his disability and protection. Patrick's kindness to others and inability to stand up for himself often made him a victim to the more vetted inmates. He would give all of his food commissary and books away, unless given a direct order by an Officer not to. These orders are not facility rules, however we found that Patrick cannot break a rule and it is the only way he would accept his meals and hold onto his belongings. As Patrick opened up more to Officers and civilian staff, we started to give him small cleaning jobs to do to occupy his time. He often sang and giggled while performing these tasks. With the help of the mental health staff, we convinced Patrick to try and transition into a general housing unit. These housing units are mostly made up of classification inmates that Patrick could not be out of his cell at the same time as, meaning for first shift he would stay in his cell and on second shift he was able to go outside, to the rec yard, watch TV and of course clean as this is something he enjoys doing to occupy his time. It is this housing unit where he has remained in as of this writing.

One last encounter that I will touch on was also during a visit with his mother. His father was dealing with health issues and was not able to come as often. Patrick's mother disclosed to me that he has a younger brother that was too scared to come visit. Patrick did not want him to

come to a jail. I informed Patrick's mom that our facility has tablets in which he could video chat on. She could utilize that for the father, brother, and maybe even herself so she could combine her commutes each week from two visits, to one. It was at this time Patrick adamantly refused video visits. He continued on to cry and explain to me that he did something wrong using social media and he would never touch one again. I tried to explain he could use it strictly to communicate with his family and even offered to supervise if it made him more comfortable. As he continued to refuse, I attempted to use a direct order to call his mom with a tablet, he said "Sorry mam, you can give me a hearing, I never want to use the tablet." To the date of this letter, he has yet to attempt to use a tablet.

This long letter could have simply been stated as the following. Patrick is extremely intelligent and enjoys learning yet lacks basic common sense. It is clear to the average person that Patrick is not "normal." Patrick clearly struggles from some developmental disabilities. Patrick acts very much like a child. He often resorts to cartoons, children's books and children's shows. I could find common grounds to talk to him about because I am a mother of small children, and because I have experience with autism. Patrick is very routine oriented and structured person. He does not like change. He does not easily forgive his mistakes. While incarcerated Patrick has shown that he is an overly compliant person. He does not violate any facility rule that is within his understanding with the fear of repercussions (in which he has every facility rule and regulation memorized). Patrick does not "want" for anything. He does not want people to help him. He often feels as though he is a burden for others when truly they want to help him. Patrick is kind to a fault, making him a victim to certain populations. Patrick is completely unknowing to being a "joke" to certain people and will often join in laughing with them. It's very hard to explain the person Patrick is to someone who is just looking at him from across the room, someone who is reading about him on paper, someone who hasn't spent time with him, someone who does not understand disabilities. This is why I chose to include some personal encounters with him. All of this is based on my opinion and personal experience with Patrick over the course of nine months.

Sincerely,  
Officer Katie Connors